## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

COURTNEY SMITH, a/k/a COURTNEY ALEXANDER,

awiggins@nachtlaw.com

Plaintiff, Case No. 24-12065

v. Hon. Jonathan J.C. Grey

FORD FIELD MANAGEMENT, LLC,

Defendant.

Gary S. Fealk (P53819) David A. Nacht (P47034) Grace Cathryn Cretcher Cameron D. Ritsema (P86887) **BODMAN LAW** Alysa J. Wiggins (P88205) NACHTLAW, P.C. Attorneys for Defendant Attorneys for Plaintiff 201 W. Big Beaver Road, Suite 500 501 Avis Drive, Suite 3 Troy, MI 48084 Ann Arbor, MI 48108 (248) 743-6000 (734) 663-7550 gfealk@bodmanlaw.com dnacht@nachtlaw.com critsema@bodmanlaw.com gcretcher@nachtlaw.com

## RE-NOTICE OF TAKING THE REMOTE DEPOSITION OF LINDSAY VERSTEGEN

The deposition shall be taken for any and all purposes allowed by the Federal Rules of Civil Procedures and shall be taken via remote conferencing technology by a person authorized to administer oaths in the State of Michigan:

DEPONENT: LINDSAY VERSTEGEN

DATE: Friday, June 20th, 2025

TIME: **1:00 p.m. EST** 

LOCATION: Zoom Remote Video Conference

Details to follow

COURT REPORTER: FORTZ LEGAL

TAKEN BY: Attorney for Plaintiff

The deposition shall continue until completion. You are invited to attend and

examine the witness.

SUBPOENA DUCES TECUM

If not already produced, the deponent is required to provide all documents in

their possession relating to this lawsuit, including, but not limited to:

A. Any and all documents related to Plaintiff Courtney Smith and/or the

allegations in Plaintiff's Complaint or Defenses thereto;

B. Any and all documents relating to Plaintiff Courtney Smith including

all notes, texts, emails, correspondence and memoranda; and

C. Any and all documents and emails relating to Plaintiff Courtney Smith

all business and/or personal computers, smart phones or other devices of the

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deponent.

Respectfully submitted,

NACHTLAW, P.C.

/s/ Grace Cathryn Cretcher

Grace Cathryn Cretcher

Dated: June 5, 2025

## **PROOF OF SERVICE**

I hereby certify that on June 5th, 2025, I served the foregoing Notice of Deposition *Duces Tecum* to all of the attorneys of record via email.

/s/ Ellen Bauer Ellen Bauer, Assistant Paralegal